

EXHIBIT A

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| STATE OF SOUTH CAROLINA |) | IN THE COURT OF COMMON PLEAS |
| |) | FOR THE FOURTH JUDICIAL CIRCUIT |
| COUNTY OF DARLINGTON |) | Civil Action No.: 2022-CP-16- |
| |) | |
| Jean Irene Lesperance, Jr., |) | |
| |) | |
| Plaintiff, |) | |
| vs. |) | |
| |) | SUMMONS |
| |) | (Jury trial demanded) |
| Steve Goodwin Logging, Inc., Randy |) | |
| Ray Bailey and Randy Bailey Trucking |) | |
| Co. LLC, |) | |
| |) | |
| Defendants. |) | |

TO: THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint in this action, a copy of which is herewith served upon you, upon the subscriber at his offices at 301 Gibson Road, Lexington, South Carolina, within thirty (30) days of the service hereof, and if you fail to answer the complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the complaint.

THE RICK HALL LAW FIRM, LLC

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Lexington, S.C.
 March 9, 2022

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| COUNTY OF DARLINGTON |) | Civil Action No.: 2022-CP-16- |
| |) | |
| Jean Irene Lesperance, Jr., |) | |
| |) | |
| Plaintiff, |) | |
| vs. |) | |
| |) | COMPLAINT |
| |) | (Jury trial demanded) |
| Steve Goodwin Logging, Inc., Randy |) | |
| Ray Bailey and Randy Bailey Trucking |) | |
| Co., LLC, |) | |
| |) | |
| Defendants. |) | |

The Plaintiff, complaining against the Defendants above named, would respectfully show to the Court as follows:

PARTIES AND JURISDICTION

1. The Plaintiff, Jean Irene Lesperance, Jr., is a citizen and resident of Charleston County, South Carolina.
2. That the Defendant, Steve Goodwin Logging, Inc. is a corporation organized and existing under and pursuant to the laws of the state of North Carolina.
3. That the Defendant, Randy Bailey Trucking Co., LLC is limited liability company organized and existing under the laws of the State of North Carolina.
4. That the Defendant, Randy Ray Bailey, is, upon information and belief, a citizen and resident of the State of North Carolina.
5. That at all times herein mentioned, the Defendant, Randy Ray Bailey, was operating as an agent and servant of Defendant Steve Goodwin Logging, Inc., and Randy Bailey Trucking Co., LLC
6. That the most substantial part of the alleged negligent acts or omissions giving rise to this cause of action occurred in Darlington County, South Carolina.

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7. Therefore, venue lies in Darlington County, South Carolina and within the Court of Common Pleas for Darlington County.

FACTUAL BACKGROUND AND ALLEGATIONS

8. That on or about March 12, 2019, the Plaintiff travelling with his companion, Erick Liles in a vehicle heading westbound on Harry Byrd Highway in Darlington, South Carolina, known as S.C. Highway 34 and was slowing to conduct a right-hand turn into a private business.

9. The Defendant Randy Ray Bailey, while operating a 2014 Kenwood tractor-trailer, was following behind the vehicle driven by the Plaintiff Lesperance, and was driving too fast for conditions and struck the rear end of the Plaintiff's vehicle with great force, causing significant property damage and personal injuries

10. That the Defendant Steve Goodwin Logging, Inc. and Randy Bailey Trucking Co., LLC are liable for all of the acts of their servant and agent, Randy Ray Bailey, under the doctrine of *respondeat superior*.

11. That the Defendants were willful, wanton, negligent and grossly negligent in the following particulars:

- a. Failing to keep the vehicle driven by the Defendant Bailey under proper control;
- b. Following too closely;
- c. Driving at an excessive rate of speed;
- d. Driving too fast for conditions;
- e. In failing to keep a proper lookout;
- f. and in such other and further particulars as may be uncovered during the course of discovery, and

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all of which were a proximate cause of the injuries and damages sustained by the Plaintiff herein.

12. That as a direct and proximate result of the collision, the Plaintiff sustained significant bodily injury, including post- concussion syndrome, headaches, cervical and lumbar injuries, right shoulder injuries, traumatic brain injury and mental anguish and loss of enjoyment of life. The Plaintiff has incurred medical specials in this case in excess of \$122,515, and is expected to incur future medical specials, lost wages, both past and future and significant pain, suffering and mental anguish into the future.

13. That the Plaintiff is therefore informed and believes that he is entitled to an award of damages, both actual and punitive in an amount to be determined by a jury.

Wherefore, having fully set forth his Complaint herein, the Plaintiff prays that he be granted judgment against the Defendants for actual and punitive damages in an amount to be determined by a jury, and for the costs of this action.

Respectfully submitted,

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